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6 Attorneys for Defendant  
KENNETH GOULD  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 KENNETH GOULD,

15 Defendant.  
16

Case No. 1:21-cr-00243-JLT-SKO

**STIPULATION TO CONTINUE STATUS  
CONFERENCE, ORDER**

Date: April 6, 2022  
Time: 1:00 p.m.  
Judge: Hon. Sheila K. Oberto

17 IT IS HEREBY STIPULATED by and between the parties through their respective  
18 counsel, Assistant United States Attorney Joseph Barton, counsel for plaintiff, and Assistant  
19 Federal Defender Erin Snider, counsel for Kenneth Gould, that the status conference currently  
20 scheduled for April 6, 2022, at 1:00 p.m. may be continued to August 3, 2022, at 1:00 p.m.

21 On October 14, 2021, Mr. Gould appeared before Magistrate Judge Barbara A.  
22 McAuliffe for an arraignment on an indictment charging him with bank larceny in violation of  
23 18 U.S.C. § 2113(b). At the parties' request, Judge McAuliffe set a status conference for January  
24 19, 2022, at 1:00 p.m. and excluded time under the Speedy Trial Act. On January 6, 2022, the  
25 parties stipulated to continue the January 19, 2022, status conference to April 6, 2022 and, again,  
26 agreed to exclude time under the Speedy Trial Act.

27 The parties now request that the Court continue the April 6, 2022 status conference to  
28 August 3, 2022, at 1:00 p.m. The parties request the Court make the following findings:

1           1.       The government has produced 21,658 bates-marked items in this matter.

2           2.       Counsel for Mr. Gould requires additional time to review discovery, consult with  
3 her client regarding the case, and conduct necessary investigation.

4           3.       Counsel for Mr. Gould believes that failure to grant the above-requested  
5 continuance would deny her the reasonable time necessary for effective preparation, taking into  
6 account the exercise of due diligence.

7           4.       The government does not object to the continuance.

8           5.       Based on the above-stated findings, the ends of justice served by continuing the  
9 case as requested outweigh the interest of the public and the defendant in a trial within the  
10 original date prescribed by the Speedy Trial Act.

11          6.       For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
12 *et seq.*, within which trial must commence, the time period of April 6, 2022, to August 3, 2022,  
13 inclusive, is excludable pursuant to 18 U.S. C. § 3161(h)(7)(A) and (B)(iv).

14           **IT IS SO STIPULATED.**

15                               Respectfully submitted,

16                               PHILLIP A. TALBERT  
17                               United States Attorney

18       Date: March 30, 2022

19                               /s/ Joseph Barton  
20                               JOSEPH BARTON  
                                  Assistant United States Attorney  
                                  Attorney for Plaintiff

21                               HEATHER E. WILLIAMS  
22                               Federal Defender

23       Date: March 30, 2022

24                               /s/ Erin Snider  
25                               ERIN SNIDER  
                                  Assistant Federal Defender  
                                  Attorney for Defendant  
26                               KENNETH GOULD  
27  
28

**ORDER**

**IT IS SO ORDERED.** The status conference currently scheduled for April 6, 2022, at 1:00 p.m. is hereby continued to August 3, 2022, at 1:00 p.m.

Date: 3/31/2022

Sheila K. Oberto  
Hon. Sheila K. Oberto  
United States District Judge